

UNITED STATES DISTRICT COURT
for the

Eastern District of Michigan

United States of America

v.

Rahman Muhammad

Case: 2:25-mj-30133
Assigned To : Unassigned
Assign. Date : 3/11/2025
Case No. Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 7, 2025, February 11, 2025 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm.

This criminal complaint is based on these facts:

See the attached affidavit

Continued on the attached sheet.


Complainant's signature

Joshua Loy, Special Agent-ATF
Printed name and title


Judge's signature

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 11, 2025

City and state: Detroit, Michigan

Hon. David R. Grand, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Joshua Loy, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been employed as a special agent with the ATF since June 2018. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered to conduct investigations and make arrests of offenses enumerated under federal law. I am currently assigned to the ATF Detroit Field Division’s Ann Arbor office. I graduated from the Federal Law Enforcement Training Center and the ATF Special Agent Basic Training Course. I am responsible for investigating violations of federal firearms laws, among other crimes. During my time in law enforcement, I have participated in numerous criminal investigations involving firearms crimes, armed drug tracking violations, and offenses by criminal street gangs, among others.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited

purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. The ATF is currently investigating Rahman MUHAMMAD for violating 18 U.S.C. § 922(g)(1), being a felon in possession of a firearm.

II. PROBABLE CAUSE

4. On February 7, 2025, members of the Washtenaw County Sheriff's Office (WCSO) Community Action Team (CAT) were involved in mobile surveillance attempting to locate a fugitive with state warrants.

5. During this surveillance, Deputies observed a vehicle (a silver Ford Focus, bearing Michigan license plate ESW6343) believed to be associated with the suspected fugitive, depart the residence of XXXX Grove Rd, Ypsilanti, Michigan. Deputies later observed the vehicle park in the parking lot of the Avenue Market, located at 902 W. Michigan Avenue, Ypsilanti, Michigan. WCSO Sgt. Montgomery and Deputy Zehel observed the vehicle backed into a parking spot on the West side of the parking lot. While conducting surveillance, WCSO Deputies heard multiple shots fired from the area of the target of their investigation.

REVIEW OF VIDEO FOOTAGE AND SEIZURE OF EXPENDED CASINGS

6. WCSO Deputies returned to the Avenue Market located at 902 W. Michigan Ave, where Ypsilanti Police Department (YPD) was on scene and

collected three (3), 9mm caliber, expended shell casings and a bullet fragment (these casings and bullet fragment were turned over to WCSO Sgt. Montgomery on February 13, 2025).

7. WCSO Deputies reviewed the surveillance footage from the security cameras on Avenue Market which face the parking lot. Upon review, Deputies were able to observe the unknown driver of the silver Ford Focus (believed to be Rahman MUHAMMAD) get into what appears to be a verbal altercation with an unknown individual who is the driver of a black SUV.

8. The driver of the SUV gets into his vehicle and departs the location. As the black SUV departs the location, MUHAMMAD (wearing a black jacket, blue jeans, and tan boots) raises his arms holding what appears to be a pistol in his right hand and fires three (3) shots in the direction of the black SUV (*see* images below). MUHAMMAD subsequently enters his silver vehicle and departs the location.



EXECUTION OF STATE SEARCH WARRANT

9. On February 11, 2025, a state search warrant was executed at XXXX Grove Rd, Ypsilanti, Michigan by members of the Washtenaw County Metro Swat Team, WCSO CAT and S/A Loy were present to assist with the search of the residence. Present in the residence at the time of the search warrant was Rahman MUHAMMAD (B/M, XX/XX/1986), another adult male, and four juvenile children.

10. Once the scene was secure, the following items were located and recovered from a far west bedroom;

- i. One (1) loaded Glock, model 17, 9mm, semiautomatic pistol, bearing S/N: BYEP183, located in the bottom drawer of the nightstand.

- ii. Eight (8) live rounds of 9mm ammunition, recovered from the aforementioned Glock firearm,
- iii. One (1) clear knotted baggie containing suspected ecstasy pills, located in pocket of blue jeans on bedroom floor.
- iv. One (1) debit card with Rahman MUHAMMAD's name on it, located in pocket (same pocket as the suspected ecstasy) of blue jeans on bedroom floor.
- v. One (1) pair of men's blue jeans which contained the aforementioned narcotics and debit card belonging to Rahman MUHAMMAD. Located on the floor.
- vi. One (1) blue Samsung smartphone. Located on the nightstand.
- vii. One (1) pair of tan Timberland boots. Located on the floor.
- viii. One (1) small backpack containing University of Michigan medical paperwork with Rahman MUHAMMAD's name on it. Located on the floor.

NIBIN SUBMISSION AND RESULTS

11. Law enforcement submitted a NIBIN analysis request to the ATF Detroit Field Division for the recovered Glock, model 17. On February 18, 2025, I received a notification for a high probability lead connecting the

recovered Glock, model 17 test fired casings to the recovered casings from the February 7, 2025 shooting at Avenue Market parking lot.

REVIEW OF CRIMINAL HISTORY

12. S/A Loy completed a review of Rahman MUHAMMAD's comprehensive criminal history (CCH) which revealed MUHAMMAD has at least the following felony convictions:

- i. 2003 – MAN/DEL CS PG 1<1 G – Pled Guilty
(Conviction out of Texas)
- ii. 2005 – Felony Controlled Substance –
Delivery/Manufacture Marijuana/Synthetic Equivalents –
Found Guilty (Conviction out of Michigan)
- iii. 2014 – 18 USC 922(g)(1) Felon in possession (ATF
Kansas City) – Pled Guilty (sentenced to 48 months BOP
custody and 36 months supervised release)
- iv. 2021 – Felony Controlled Substance – Possess (cocaine,
heroin or another narcotic) less than 25 grams – Pled Guilty
(Conviction out of Michigan)

13. Based on my training and experience, I understand that individuals who plead guilty to felony offenses are advised at their plea/sentencing hearings of the consequences of their guilty plea, including the nature of the offenses that they have pleaded guilty to. I also understand that individuals who have served prison

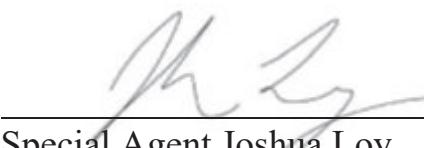
sentenced for felony offenses are similarly advised that they are felons and are not permitted to possess firearms. Based on the above, I have probable cause to believe that MUHAMMAD knew he had previously been convicted of an offense punishable by more than one year in prison.

14. I consulted with an interstate nexus expert who confirmed the Glock, model 17, pistol had travelled in interstate commerce.

III. CONCLUSION

15. There is probable cause to believe that on February 7, 2025, and February 11, 2025, in the Eastern District of Michigan, Rahman MUHAMMAD knowingly possessed a firearm after having been convicted of a felony offense, that he knew of his felony status at the time, and that the firearm affected interstate or foreign commerce, all in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Special Agent Joshua Loy
Bureau of Alcohol, Tobacco, Firearms and
Explosives.

Sworn to before me and signed in my presence
And/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Date: March 11, 2025